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ATTORNEY FOR THE DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: §
§
Amy Goldblatt Howard § **Case No. 09-35705-SGJ-13**
§
Debtor. § **(Chapter 13)**

**RESPONSE TO MOTION OF PNC MORTGAGE, A DIVISION
OF PNC BANK, N.A. SUCCESSOR TO NATIONAL CITY BANK
ITS ASSIGNS AND/OR SUCCESSORS IN INTEREST FOR
RELIEF FROM STAY OF ACTION AGAINST CO-DEBTOR(S)
PURSUANT TO 11 U.S.C. § 362(a) AND WAIVER OF
THIRTY DAY REQUIREMENT PURSUANT TO § 362(e)**

John Howard (the "Co-Debtor"), hereby files this Response (the "Response") to the Motion (the "Motion") for Relief from Stay of Action Against Debtor(s) Pursuant to 11 U.S.C. § 362(a) and Waiver of Thirty Day Requirement Pursuant to § 362(e) (the "Movant"). In support of this Response, the Co-Debtor states:

1. The Co-Debtor admits the allegations contained in Paragraph 1 of the Motion.
2. The Co-Debtor admits the allegations contained in Paragraph 2 of the Motion.
3. The Co-Debtor admits the allegations contained in Paragraph 3 of the Motion.
4. The Co-Debtor admits the allegations contained in Paragraph 4 of the Motion.
5. The Co-Debtor admits the allegations contained in Paragraph 5 of the Motion.
6. The Co-Debtor admits the allegations contained in Paragraph 6 of the Motion.

7. The Co-Debtor admits the allegations contained in Paragraph 7 of the Motion.
8. The Co-Debtor admits the allegations contained in Paragraph 8 of the Motion.
9. The Co-Debtor denies the allegations contained in Paragraph 9 of the Motion.
10. The Co-Debtor denies the allegations contained in Paragraph 10 of the Motion.
11. The Co-Debtor denies the allegations contained in Paragraph 11 of the Motion.
12. The Co-Debtor denies the allegations contained in Paragraph 12 of the Motion.
13. The Co-Debtor denies the allegations contained in Paragraph 13 of the Motion.

WHEREFORE, PREMISES CONSIDERED, the Co-Debtor requests that the Motion be denied, and that the Co-Debtor be granted all other relief as justice may require.

Dated: December 15, 2009.

Respectfully submitted,

By: /s/ Howard Marc Spector
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 15, 2009 a true and correct copy of the foregoing was served upon the parties listed below via regular mail or electronic means.

/s/ Howard Marc Spector
Howard Marc Spector

